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REMARKS

Claims 1-20 are pending.

Claims 1-20 are rejected.

No claims have been amended.

Claims 1, 16, and 19 are independent claims.

I. CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 1-8, 11, and 13-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Japanese Patent Publication No. JP2001007068 ("White") in view of U.S. Patent No. 4,052,211 ("Inoue"). Applicants respectfully traverse this rejection.

The Examiner states that White discloses "an SRD having a substrate support, fluid source, and shield" (Office Action page 3 line 7). However, the Examiner states that White "does not specifically disclose the shield has a particle-blasted finish to increase hydrophilic properties" and points to Inoue to show that graining procedures such as sand blasting may render a surface hydrophilic (Office Action page 3 lines 11-13).

Applicants respectfully submit that there is no motivation to combine Inoue with White. Inoue describes an image-forming material (col. 1 lines 38-39). In part, Inoue apparently describes forming a lithographic printing plate (col. 10 lines 16-18). The plate may be grained, by one of several techniques, to make the plate hydrophilic (col. 10, lines 20-21). One of the techniques may be sandblasting (col. 10, line 22). The plate receives layers of an interreaction

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product, a metal, and a treatment to impart oleophilicity (ink accepting properties) before it can be used as a positive type lithographic printing plate (col. 10 lines 20-29). A purpose of a hydrophilic surface in Inoue is to promote dyeing of an interreaction layer (col. 9 lines 61-64). Inoue does not disclose a shield, particle blasted or otherwise. Furthermore, Inoue does not disclose a shield for use in a spin rinse dryer.

In contrast to Inoue, the shield in the *spin rinse* dryer of the present invention is designed "to receive fluid thrown off by a substrate which is rinsed and spun within the SRD" (Applicants' specification, page 4, lines 19-20). Applicants respectfully submit that one of ordinary skill would not be motivated to particle blast the shield of a spin rinse dryer based on a process used during formation of an image forming plate. The imaging plate of Inoue is not designed for the same use as the shield of the present invention.

Accordingly, Applicants respectfully submit that independent claims 1, 16, and 19 and dependent claims 2-8, 11, 13-15, 17-18, and 20, which depend therefrom, are patentable over the cited references and respectfully request the Examiner reconsider and withdraw this rejection.

Claims 9, 10, and 12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over White in view of Inoue and further in view of U.S. Patent No. 5,476,520 ("Jaffe"). Applicants respectfully traverse the rejection.

The Examiner states that White in view of Inoue discloses the apparatus of the present invention save the shield is made from polycarbonate. According to the examiner, Jaffe discloses a shield made of polycarbonate and states it

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would have been obvious to one of ordinary skill in the art to modify White and Inoue with a polycarbonate of Jaffe.

Jaffe appears to relate to an ion implantation system (col. 1 line 13). Applicants respectfully submit that one of ordinary skill in the art would not apply a polycarbonate shield of Jaffe's ion implantation system to a spin rinse dryer system. Jaffe himself had the opportunity to apply the shield to other "semiconductor processing equipment", but only appears to mention "plasma etchers, chemical vapor deposition apparatus, physical vapor deposition apparatus" (col. 4 lines 18-20), not spin rinse dryer systems.

The problems trying to be solved by shielding in Jaffe and shielding in the present are very different. Jaffe is concerned with cross contamination of one type of material used in processing a first batch of wafers, with a second batch of wafers receiving a different type of material (col. 1 lines 23-35 and lines 65-67). In contrast, the present invention is concern with dripping the same process material on the same wafers being processed. Therefore, in Jaffe's case, it is important that the shield absorbs material (ions in Jaffe's case) and not shed them (col. 3, lines 44-47). However, in the present invention, it is important that the shield collect AND shed the material (in this case a fluid) in a controlled fashion down the shielding (page 11 lines 5-10 and line 20).

Additionally, ion implantation, as well as the other processes (plasma etching, chemical vapor deposition and physical vapor deposition) mentioned by Jaffe occur under vacuum. In a vacuum environment, special vacuum compatible materials must be used, such as polycarbonate which does not outgas substantially (col. 3 lines 33-48). Since spin rinse

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drying takes place at atmospheric conditions, there are no special concerns regarding vacuum compatibility of materials used in the equipment.

For at least the reasons cited above applicants respectfully submit that claims 9, 10, and 12 are patentable over the cited references and respectfully request the Examiner reconsider and withdraw this rejection.

Additionally, dependent claims 9, 10, and 12 inherit the features of patentable claim 1, as described above. Jaffe does not appear to overcome the deficiencies of the above-discussed references. Therefore, for at least the reasons cited above with respect to independent claim 1, from which dependent claims 9, 10, and 12 depend, Applicants respectfully submit that claims 9, 10, and 12 are patentable over the cited references and respectfully request the Examiner reconsider and withdraw this rejection.

## II. DOUBLE PATENTING REJECTION

Claims 1-8, 11, and 13-20 are rejected on the ground of nonstatutory obviousness type double patenting as being unpatentable over claims 1, 5-8, 11-15, 17, 24-26, 32, 33, 38-41, and 47 of U.S. Patent No. 6,516,816 ("Husain") in view of U.S. Patent No. 4,052,211 ("Inoue"). Applicants respectfully traverse this rejection.

As discussed above with respect to the 35 U.S.C. § 103(a) rejection of claims 1-8, 11, and 13-20, Applicants do not believe there is motivation to combine the teachings of Inoue with that of the White (or Husain) reference.

Accordingly, Applicants respectfully submit that independent claims 1, 16, and 19 and dependent claims 2-8, 11, 13-15, 17-18, and 20, which depend therefrom, are patentable

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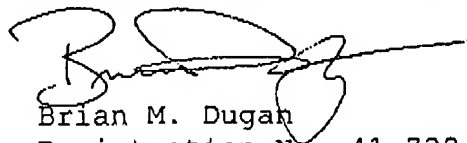
over the cited references and respectfully request the Examiner reconsider and withdraw this rejection.

III. CONCLUSION

The Applicants believe all the claims are now in condition for allowance, and respectfully request reconsideration and allowance of the same.

Applicants do not believe any other fees are due regarding this amendment. If any other fees are required, however, please charge Deposit Account No. 04-1696. The Applicants encourage the Examiner to telephone Applicants' attorney should any issues remain.

Respectfully Submitted,



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Dated: May 14, 2007  
Tarrytown, New York